

EXHIBIT 4

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Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF WISCONSIN

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4
5 ANDREW L. COLBORN,

6 Plaintiff,

7 vs.

No. 19-CV-484

8 NETFLIX, INC., CHROME MEDIA, LLC,

9 f/k/a SYNTHESIS FILMS, LLC,

10 LAURA RICCIARDI, and MOIRA DEMOS,

11 Defendants.

16 CONFIDENTIAL DEPOSITION OF

17 LISA DENNIS

18 LOS ANGELES, CALIFORNIA

19 WEDNESDAY, AUGUST 17, 2022

23 REPORTED REMOTELY BY:

24 ANITA A. SHENIAN, CSR NO. 12325

25 VERITEXT LEGAL SOLUTIONS ASSIGNMENT NO. 5343861

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5 ANDREW L. COLBORN,

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No. 19-CV-484

8 NETFLIX, INC., CHROME MEDIA, LLC,

9 f/k/a SYNTHESIS FILMS, LLC,

10 LAURA RICCIARDI, and MOIRA DEMOS,

11 Defendants.

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15 Confidential deposition of LISA DENNIS, taken

16 on behalf of Plaintiff, at 707 Wilshire Boulevard,

17 Suite 3500, Los Angeles, California, commencing at

18 9:23 a.m., Wednesday, August 17, 2022, taken before

19 ANITA A. SHENIAN, a Certified Shorthand Reporter for

20 the State of California, CSR No. 12325.

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1 A P P E A R A N C E S:
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4 FOR THE PLAINTIFF:
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BY CHRISTINA D. SOMMERS, Esq.

(Appearing via Zoom)

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(Appearances continued)

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1 A P P E A R A N C E S :

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4 FOR DEFENDANT NETFLIX, INC.:

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BALLARD SPAHR, LLP

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8

BY ISABELLA S. NASCIMENTO, Esq.

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(Appearing via Zoom)

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ALSO PRESENT:

DEBORAH BURSIK, Esquire

MEGHAN E. FENZEL, Esquire

EMMY PARSONS, Esquire

MOIRA DEMOS, Defendant

LAURA RICCIARDI, Defendant

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I N D E X

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3 WITNESS LISA DENNIS

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EXAMINATION

PAGE

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BY MS. SOMMERS

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EXHIBITS

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PLAINTIFF'S

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NUMBER

DESCRIPTION

PAGE

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Exhibit 74

E-Mail String Bates Numbered

35

NFXCOL0001904 to NFXCOL0000492

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16

Exhibit 75

E-Mail String Bates Stamped

76

CHRM034769 to CHRM000482

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Exhibit 76

E-Mail String Bates Numbered

82

DENNIS00043429 to

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DENNIS00049008

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DEFENDANTS'

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(NONE)

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1 QUESTIONS THE WITNESS WAS EITHER INSTRUCTED NOT TO
2 ANSWER OR REFUSED TO ANSWER ARE INDICATED IN THE
3 TRANSCRIPT WITH AN ASTERISK (*) SIGN AND ARE LOCATED ON
4 THE FOLLOWING PAGE AND LINE NUMBERS:

5

6 | (NONE)

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10 INFORMATION TO BE SUPPLIED IN THE TRANSCRIPT:

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1 representatives from all three law firms. What did you
2 speak with representatives of Attorney Vick's office
3 about?

4 A. He -- he contact -- honestly, I don't
5 remember. I remember being contacted, I remember having
6 a general discussion, but no specifics.

7 Q. And with respect to any conversations you had
8 with attorneys or their colleague's at Ballard Spahr, do
9 you have any recollection of what you spoke about?

10 A. Who is at Ballard and Spahr? Is that Emmy?

11 Q. I believe so.

12 A. I'm sorry. Would you repeat yourself?

13 Q. Yes.

14 A. We spoke about my role -- like, what was my
15 job on the movie -- very lightly. I was asked my
16 opinion of the executive, Lisa Nishimura, at Netflix.

17 And I was asked if I believed that the way --
18 the filmmaker's approach was very balanced. But that
19 was always their, you know, forward operating behavior.

20 Q. Let's break those three issues down. And I'm
21 curious how you answered all those questions.

22 So what was your job on the movie, meaning
23 Making a Murderer?

24 A. In a production supervising role, where I
25 helped with scheduling, I was a primary contact with

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1 you know, sober-minded and forthright, and not
2 particularly available early on in the process to us.

3 Q. Did Ms. Parsons ask any follow-up questions?

4 A. I don't know. I don't remember.

5 Q. What was the significance to you of her lack
6 of availability early in the project?

7 A. Not significant. I mean, she was busy.

8 Q. Sure. And I think you relayed that you found
9 her to be forthright. Did I hear you correctly?

10 A. Yeah.

11 Q. And did you discuss with Ms. Parsons
12 Ms. Nishimura's role in influencing what would be the
13 final product that was Making a Murderer?

14 A. I don't remember.

15 Q. The third thing you mentioned speaking with
16 Ms. Parsons about was that she asked if you believed the
17 filmmaker's approach was appropriate and fair, something
18 to that effect?

19 A. Sorry. Repeat your question, please.

20 Q. Sure. You mentioned that Emmy Parsons asked
21 you about the filmmaker's approach to Making a Murderer.
22 What specifically did you two discuss about that?

23 A. I don't really understand the question. I
24 mean, to the best of my knowledge, when I was having
25 this discussion about Emmy --

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1 Q. Sure. Now, let me ask a more specific
2 question. I believe you had mentioned she asked you if
3 you believed that they were fair and balanced. Is that
4 accurate?

5 A. Yeah. Those probably weren't her words, but
6 sure.

7 Q. And what was your response?

8 A. Absolutely.

9 Q. And to the best of your recollection, was
10 there any further discussion of the basis of that
11 opinion?

12 A. I don't remember.

13 Q. In preparing for your deposition today, who
14 have you spoken to, if anyone?

15 A. I did nothing to prepare for this deposition,
16 and I've spoken to nobody.

17 Q. So fair to say that you haven't reviewed any
18 documents in preparation for today?

19 A. Not even my own E-mail.

20 Q. Okay. And you haven't reviewed any
21 transcripts taken of any other depositions in this case?

22 A. No, no.

23 Q. All right. When was the last time you spoke
24 with or otherwise communicated with Moira Demos?

25 A. I don't know exactly. It's been many years.

1 and E-mailed out to a host of people.

2 Q. When you would get one of these, were there a
3 lot of links in there that mentioned Making a Murderer,
4 such that you would think this is getting a lot of
5 press?

6 MS. NASCIMENTO: Objection; relevance.

7 BY MS. SOMMERS:

8 Q. Let me ask a different question. I just want
9 to understand what you understood the reception of
10 Making a Murderer was, in that how broad -- how broad
11 the distribution was being viewed and how it was
12 received.

13 Now, let me put that into a question: After
14 Making a Murderer went live on Netflix, what is your
15 understanding of how wide the viewership of that series
16 became, to your personal knowledge?

17 A. That it was immensely popular.

18 Q. And what is your understanding, to your
19 personal knowledge, of the level of coverage the series
20 was getting in the national press?

21 A. Getting a lot of press. Very popular show.

22 Q. And that press was national; not, for example,
23 local to Wisconsin?

24 A. I feel very compelled to say the things to you
25 that I know definitively, and I just want to repeat

1 STENOGRAPHIC REPORTER'S CERTIFICATE
2
34 I, ANITA A. SHENIAN, CSR No. 12325, Certified
5 Shorthand Reporter, certify;6 That the foregoing proceedings were taken by me
7 remotely at the time and place therein set forth, at
8 which time the witness was put under oath by me;9 That the testimony of the witness, the questions
10 propounded, and all objections and statements made at
11 the time of the examination were recorded
12 stenographically by me and were thereafter
13 transcribed;14 That the foregoing is a true and correct transcript
15 of my shorthand notes so taken.16 I further certify that I am not a relative or
17 employee of any attorney of the parties, nor financially
18 interested in the action.19 I declare under penalty of perjury under the laws
20 of California that the foregoing is true and correct.21 Dated this 22nd day of August, 2022.
2223 24 ANITA A. SHENIAN, CSR No. 12325
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